

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

IN RE: EASTMAN KODAK ERISA
LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

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) MASTER FILE NO. 6:12-CV-06051-DGL
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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the attached Declaration of Gerald D. Wells, III, Esq. with Exhibit A dated April 22, 2016, the Memorandum of Law In Support of Plaintiff's Unopposed Motion For Preliminary Approval of the Settlement Agreement dated April 22, 2016, and upon all papers and proceedings heretofore had herein, Plaintiffs will move this Court at the United States Courthouse for the Western District of New York located at 100 State Street, Rochester, New York, for an Order: (a) preliminarily approving the Settlement Agreement; (b) conditionally certifying the proposed Settlement Class pursuant to Fed. R. Civ. P. 23(b)(1) and/or (b)(2); (c) approving the form and contents of the Class Notice; (d) authorizing the Settlement Administrator to disseminate the Class Notice to Settlement Class members; and (e) setting a date and time for the Fairness Hearing for the proposed Settlement and all related deadlines.

Dated: April 25, 2016

Respectfully submitted,

Blitman & King LLP

By: /s/Jules L. Smith

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